



FILED

SEP 03 2014

Phil Lombardi, Clerk
U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM RAY ALLEN,

Defendant.

Case No.

14 CR 150 GKF

INDICTMENT

[COUNTS 1 through 4: 18 U.S.C.

§§ 1341 and 1346 – Honest Services

Mail Fraud;

COUNTS 5 through 8: 18 U.S.C.

§ 201(b)(2)(B) – Accepting a Bribe]

THE GRAND JURY CHARGES:

COUNTS ONE THROUGH FOUR

[18 U.S.C. §§ 1341 and 1346]

INTRODUCTION

At all times relevant to this Indictment:

1. 12 & 12, Incorporated ("12 & 12"), did business as a drug treatment facility located at 6333 East Skelly Drive, Tulsa, Northern District of Oklahoma, contracted with the United States Probation Office for the Northern District of Oklahoma ("U.S. Probation") to provide drug testing and treatment services as ordered to persons under supervision of the United States District Court for the Northern District of Oklahoma ("U.S. District Court").

2. **WILLIAM RAY ALLEN** ("Defendant **ALLEN**"), the defendant herein, was employed by 12 & 12 as a medical technician and, in such capacity, collected urine specimens from persons subject to random urinalysis drug testing under the supervision of the U.S. Probation.

3. Defendant **ALLEN** submitted the urine specimens he collected at 12 & 12 and submitted to the United States Probation Drug Laboratory located at 500 Gold Avenue SW, STE 10226, Albuquerque, New Mexico.

THE SCHEME AND ARTIFICE

4. From at least as early as in or about June 2011, the exact date being unknown to the Grand Jury, through on or about August 15, 2014, in the Northern District of Oklahoma and elsewhere, Defendant **ALLEN** knowingly devised and intended to devise a scheme and artifice to defraud and deprive the United States and others, including, 12 & 12, the U.S. Probation Office, and the U.S. District Court, of honest, fair, and accurate drug testing through bribery and materially false statements (“the scheme”).

MANNER AND MEANS

5. Defendant **ALLEN** would and did carry out the scheme using the following manner and means among others, to wit:

a. Defendant **ALLEN** would and did provide prior notification to persons under supervision of the U.S. Probation Office that they were selected for random drug testing.

b. Defendant **ALLEN** would and did omit and fail to collect urine specimens as ordered from persons under supervision of the U.S. Probation Office.

c. Defendant **ALLEN** would and did create fraudulent chain of custody records in which he falsely certified he had witnessed persons under the supervision of the U.S. Probation Office provide urine specimens to be submitted for analysis.

d. Defendant **ALLEN** would and did demand and receive things of value, that is United States currency, as payment from persons under supervision in exchange for his unlawful omission and failure to collect urine specimens from them as ordered.

e. Defendant **ALLEN** would and did fraudulently submit, and cause to be fraudulently submitted, by substituting his own urine and the urine of other unknown third parties for analysis by the United States Probation Drug Laboratory in Albuquerque, New Mexico.

f. Defendant **ALLEN** would and did accept payment of money in exchange for falsely stating he collected and submitted urine provided by a person under the supervision of the United States Probation Office for the Northern District of Oklahoma.

EXECUTION OF THE SCHEME THE MAILING

5. On or about the below-listed dates in the Northern District of Oklahoma, for the purpose of executing the scheme and attempting to do so, Defendant **ALLEN** knowingly caused mail matter to be delivered by Federal Express Delivery Service, according to the directions thereon, from the Northern District of Oklahoma, to the U.S. Probation Drug Laboratory located in Albuquerque, New Mexico.

Count	Date	Submission	Purported Source
1	July 10, 2014	Urine Specimen	CS
2	July 22, 2014	Urine Specimen	CS
3	July 30, 2014	Urine Specimen	FBI UCA
4	August 8, 2014	Urine Specimen	FBI UCA

All in violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT FIVE
[18 U.S.C. § 201(b)(2)(B)]

Paragraphs 1 through 5 of the Indictment are realleged and incorporated by reference as if fully set forth herein.

On or about July 10, 2014, in the District of Northern District of Oklahoma, **WILLIAM RAY ALLEN**, the Defendant, a public official as provided by law for the proper discharge of official duties, directly and indirectly did demand, seek, receive, accept, and agree to receive and accept something of value personally for and because of an official act performed and to be performed by such official, that is; **WILLIAM RAY ALLEN** did accept United States currency from an individual in exchange for his fraudulent submission of a urine specimen for drug analysis, all in violation of Title 18 United States Code Section 201(b)(2)(B).

COUNT SIX
[18 U.S.C. § 201(b)(2)(B)]

Paragraphs 1 through 5 of the Indictment are realleged and incorporated by reference as if fully set forth herein.

On or about July 22, 2014, in the District of Northern District of Oklahoma, **WILLIAM RAY ALLEN**, the Defendant, a public official as provided by law for the proper discharge of official duties, directly and indirectly did demand, seek, receive, accept, and agree to receive and accept something of value personally for and because of an official act performed and to be performed by such official, that is; **WILLIAM RAY ALLEN** did accept United States currency from an individual in exchange for his fraudulent submission of a urine specimen for drug analysis, all in violation of Title 18 United States Code Section 201(b)(2)(B).

COUNT SEVEN
[18 U.S.C. § 201(b)(2)(B)]

Paragraphs 1 through 5 of the Indictment are realleged and incorporated by reference as if fully set forth herein.

On or about July 30, 2014, in the District of Northern District of Oklahoma, **WILLIAM RAY ALLEN**, the Defendant, a public official as provided by law for the proper discharge of official duties, directly and indirectly did demand, seek, receive, accept, and agree to receive and accept something of value personally for and because of an official act performed and to be performed by such official, that is; **WILLIAM RAY ALLEN** did accept United States currency from an individual in exchange for his fraudulent submission of a urine specimen for drug analysis, all in violation of Title 18 United States Code Section 201(b)(2)(B).


COUNT EIGHT
[18 U.S.C. § 201(b)(2)(B)]

Paragraphs 1 through 5 of the Indictment are realleged and incorporated by reference as if fully set forth herein.

On or about August 8, 2014, in the District of Northern District of Oklahoma, **WILLIAM RAY ALLEN**, the Defendant, a public official as provided by law for the proper discharge of official duties, directly and indirectly did demand, seek, receive, accept, and agree to receive and accept something of value personally for and because of an official act performed and to be performed by such official, that is; **WILLIAM RAY ALLEN** did accept United States currency from an individual in exchange for his fraudulent submission of a urine specimen for drug analysis, all in violation of Title 18 United States Code Section 201(b)(2)(B).

DANNY C. WILLIAMS, SR.
UNITED STATES ATTORNEY

A TRUE BILL



JOEL LYN A. MCCORMICK
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson